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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

11 ROBERT BELLON, ) Case No. 2:12-cv-01639-PMP-GWF  
12 Petitioner, )  
13 vs. )  
14 DWIGHT NEVEN, *et al.*, )  
15 Respondents. )

**MOTION FOR  
ENLARGEMENT OF TIME  
(SECOND REQUEST)**  
**AND ORDER**

16 Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of  
17 Nevada, hereby respectfully move this Court for an order granting a thirty (30) day enlargement of  
18 time, to and including June 3, 2015, in which to file and serve their response to Bellon's motion for relief  
19 from judgment.

20 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure  
21 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and  
22 other materials on file herein.

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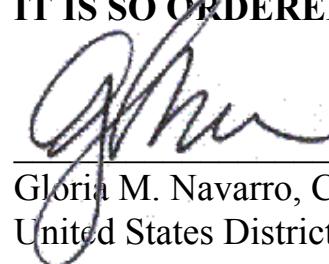
1 There has been one prior enlargement of Respondents' time to file said response, and this  
2 motion is made in good faith and not for the purposes of delay.

3 RESPECTFULLY SUBMITTED this 1st day of May, 2015.

4 ADAM PAUL LAXALT  
5 Attorney General

6 By: /s/ Jeffrey M. Conner  
7 JEFFREY M. CONNER  
8 Deputy Attorney General

9  
10 **IT IS SO ORDERED.**

11   
12 Gloria M. Navarro, Chief Judge  
13 United States District Court

14  
15 **DATED: 05/04/2015**

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

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12 Petitioner, )  
13 vs. )  
14 DWIGHT NEVEN, *et al.*, )  
15 Respondents. )

**DECLARATION OF COUNSEL**  
**JEFFREY M. CONNER**

16 I, JEFFREY M. CONNER, declare under penalty of perjury:

17 1. I am a Deputy Attorney General employed in the Appellate Division of the Nevada  
18 Attorney General's office, and I make this declaration on behalf of Respondents' motion for enlargement  
19 of time in the above-captioned matter.

20 2. By this motion, I am requesting a thirty (30) day enlargement of time, to and including  
21 June 3, 2015, to file a response to Bellon's motion for relief from judgment. (ECF No. 44.) This is my  
22 second request for an enlargement with respect to this motion.

23 3. I was hoping to have the response to Bellon complete and ready for filing by Monday,  
24 including working on it over this weekend if necessary. However, my current workload did not allow  
25 me to work on the response this week. Additionally, my grandfather passed away on Tuesday, so I will  
26 be travelling to Illinois May 2, 2015, through May 5, 2015, to be with family and attend his funeral  
27 services.

28 ///

4. Additionally, I have an opening brief due in *Echavarria v. Baker*, Case No. 15-99001 (9th Cir.), on May 18, 2015, which is going to require a substantial amount of my attention over the next two weeks, and additional filing deadlines in many other cases where I have already needed to seek multiple extensions of time as a result of my current workload.

5. As a result of the foregoing, Respondents require additional time to complete a response to the motion for relief from judgment. Accordingly, Respondents request an order from this Court granting them an extension of thirty (30) days, to and including June 3, 2015, to respond to Bellon's motion for relief from judgment.

6. I contacted opposing counsel, Assistant Federal Defender T. Kenneth Lee, and he indicated he has no objection to Respondents' request for additional time.

7. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case

I declare under penalty of perjury that the foregoing is true and correct.

By: /s/ Jeffrey M. Conner  
JEFFREY M. CONNER

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on this 1st day of May, 2015, I served a copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (SECOND REQUEST), by U.S. District Court CM/ECF electronic filing to:

T. Kenneth Lee  
Assistant Federal Public Defender  
411 East Bonneville Avenue, Suite 250  
Las Vegas, Nevada 89101

/s/ Laurie Sparman